

# EXHIBIT G

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

Case No. 1:21-mc-23103-BLOOM/Otazo-Reyes

CASA EXPRESS CORP, as Trustee of  
CASA EXPRESS TRUST,

Judgment Creditor,

v.

BOLIVARIAN REPUBLIC OF  
VENEZUELA,

Judgment Debtor.

AFFIDAVIT OF LUIS E. GAMARDO MEDINA

STATE OF FLORIDA                     )  
  ) ss:  
COUNTY OF MIAMI-DADE            )

**BEFORE ME**, personally appeared, **Luis E. Gamardo Medina**, who upon being first duly sworn, deposes and says:

1. I am over 18 years of age, of sound mind, and otherwise competent to make this Declaration. The facts set out in this Declaration is based on my personal knowledge.

2. I am the president and director of Casa Express Corp, a corporation organized and existing under the laws of the State of Florida, with its principal place of business at 60 Edgewater Drive, Coral Gables, Florida, 33133.

3. Casa Express Corp is the sole trustee of Casa Express Trust, an express trust established under the laws of the State of Florida.

4. On October 16, 2020, the District Court for the Southern District of New York entered final judgment in favor of Casa Express Corp, as Trustee of Casa Express Trust, against the Bolivarian Republic of Venezuela ("Venezuela") for non-payment of two dollar-denominated

sovereign bonds in the case styled *Casa Express Corp, as Trustee of Casa Express Trust v. Bolivarian Republic of Venezuela*, Case No. 18-civ-11940 (AT). The judgment was amended on November 23, 2020, to include prevailing attorney's fees and costs (the "Judgment").

5. After Venezuela failed to pay the Judgment for more than seven months, the Southern District of New York issued an order finding that a "reasonable period of time" elapsed since the entry of judgment pursuant to 28 U.S.C. §1610(c) of the Foreign Sovereign Immunities Act ("FSIA"), and authorizing Casa Express to begin enforcement actions in the United States.

6. On August 27, 2021, Casa Express Corp registered the Judgment this District.

7. The amount of \$43,315,535.20, plus \$126,854.36 in post-judgment interest, remains unsatisfied, due and owing from the Judgment.

8. As Judgment Creditor, Casa Express Corp commenced supplementary proceedings to execution and is entitled to implead third parties that are in possession of the Judgment Debtor's property.

9. I submit this declaration in support of the *ex parte* motion to implead Third Parties Fisher Isl. 7043, LLC and Collins Apt. 4401, LLC and for issuance of statutory notices to appear filed on behalf of the Judgment Creditor (the "Motion") in the above-captioned matter.

10. On November 8, 2022, the Third Parties Fisher Isl. 7043, LLC and Collins Apt. 4401, LLC obtained title to two Venezuelan properties without providing me, or my attorney, any notice of the sale:

- a. **18555 Collins Avenue, Unit 4401, Sunny Isles Beach, Florida 33160**, legally described as:

**Unit 4401 of 18555 Collins Avenue Condominium, a Condominium according to the Declaration of Condominium thereof, recorded in Official Records Book 28399, Page 2439, of the Public Records of Miami-Dade County, Florida, and all**

amendments thereto, together with its undivided share in the common elements.

- b. 7043 Fisher Island Dr., Unit 7043, Fisher Island, Florida 33109, legally described as:

**Unit 7043, PALAZZO DEL SOL / DELLA LUNA AT FISHER ISLAND, A CONDOMINIUM, together with an interest in the limited common elements and common elements appurtenant thereto, according to the Declaration of Condominium for Palazzo del Sol / della Luna at Fisher Island, a Condominium, as recorded on December 30, 2015, in Official Records Book 29908, Page 447, as amended from time to time, of the Public Records of Miami-Dade County, Florida.**

11. Since the above-listed properties were originally purchased with misappropriated Venezuelan funds, they are being held subject to a constructive trust in favor of Venezuela, and they are subject to execution by the Judgment Creditor pursuant to 28 U.S.C. § 1610(c) and Florida Statute § 56.29.

*FURTHER AFFIANT SAYETH NAUGHT*

  
Luis E. Gamardo Medina  
as President of Casa Express Corp

**SWORN TO AND SUBSCRIBED** before me, the undersigned authority on this 19th day of January 2023 by **Luis E. Gamardo Medina** who is personally known to me or who has produced FL Driver License as identification.

Notary Public Signature: Katherin R.



KATHERIN RIVAS  
Commission # HH 331880  
Expires November 14, 2026

Print Name: Katherin Rivas